

United States District Court
Northern District of California

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17 Attorneys for Defendant NETFLIX, INC.

18
19 **UNITED STATES DISTRICT COURT**
20
21 **NORTHERN DISTRICT OF CALIFORNIA**
22
23 **OAKLAND DIVISION**

24 LAURI VALJAKKA,

25 Plaintiff,

26 v.

27 NETFLIX, INC.,

28 Defendant.

Case No. 4:22-cv-01490-JST

**[PROPOSED] STIPULATION AMENDING
PROTECTIVE ORDER**

1 WHEREAS, by stipulation of the parties, a protective order issued in this action on July 25,
2 2022 (the “Protective Order”);

3 NOW, THEREFORE, Plaintiff and Defendant hereby agree and stipulate to the amendment
4 of the Protective Order issued in this action on July 25, 2022, as follows:

5 The following documents are designated “HIGHLY CONFIDENTIAL – ATTORNEYS’
6 EYES ONLY,” however for the purpose of transparency under Rule 408, Valjakka allows Netflix
7 In-House Counsel to view these documents:

8 LV003942;

9 LV004030;

10 LV004038;

11 LV004058;

12 LV004070;

13 LV2_000410;

14 LV2_000799;

15 LV2_002242

16 LV2_002712;

17 LV2_003057;

18 LV2_003282;

19 LV2_003450;

20 LV2_004315;

21 NFX-VALJ-00011043;

22 NFX-VALJ-00011048.

23 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

24 DATED July 27, 2023

/s/ William P. Ramey, III.

William P. Ramey, III (appearance *pro hac vice*)

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9 *Attorneys for Plaintiff LAURI VALJAKKA*

10 DATED: July 27, 2023

11 /s/ Sarah E. Piepmeier

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[PROPOSED] STIPULATION AMENDING PROTECTIVE ORDER
Case No. 4:22-cv-01490-JST

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25 *Attorneys for Defendant NETFLIX, INC.*

1 PURSUANT TO STIPULATION, IT IS SO ORDERED.
2
3 DATED: _____

4 Hon. Jon S. Tigar
5 United States District Judge
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1 **SIGNATURE ATTESTATION**

2 I, Sarah E. Piepmeier, am the ECF user whose user id and password authorizes the filing of
3 this documents. Under Civil L.R. 5-1(h)(3), I attest that counsel for Plaintiff has concurred in this
4 filing.

5 Dated: July 27, 2023

6 */s/ Sarah E. Piepmeier*

7 Sarah E. Piepmeier, CA SBN 227094

8 *Attorney for Defendant Netflix, Inc.*

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